

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BOXCAR MEDIA, LLC, and
RACEWAY MEDIA, LLC,

Plaintiffs,

v.

REDNECKJUNK, LLC,
DR. THOMAS P. CONNELLY, and
CONNELLY RACING, INC.,

Defendants.

CIVIL ACTION NO. 04-40051-NMG

JOINT MOTION FOR
ENTRY OF STIPULATED JUDGMENT
AND PERMANENT INJUNCTION

In light of the execution of a Settlement Agreement by the parties to this action, and in light of the parties' need for this Court's assistance to give effect to the terms of the Settlement Agreement, Plaintiffs Raceway Media, LLC and Boxcar Media, LLC (collectively, "Plaintiffs") and Defendants Redneckjunk, LLC, Connelly Racing, Inc., and Dr. Thomas P. Connelly (collectively, "Defendants") hereby jointly move and give notice to the Court as follows:

1. The parties jointly request that the Court enter a stipulated judgment in favor of Plaintiffs on Plaintiffs' claims in this action, in the form of a permanent injunction enjoining Defendants, together with their officers, directors, agents, successors, representatives and assigns, from engaging in the following conduct:

- (a) marketing, advertising, displaying and/or otherwise promoting, and/or using as a business name, trade name and/or domain name, the names “redneckjunk,” “redneckjunk.com,” “rjunk,” “rjunk.com,” or any other name or mark containing the word “junk”;
- (b) marketing, advertising, displaying and/or otherwise promoting, and/or using as a business name, trade name and/or domain name, any name and/or mark confusingly similar to Plaintiffs’ trademarks, which include “RacingJunk,” “RacingJunk.com,” “BoatingJunk,” “BoatingJunk.com,” “RvJunk” and “RvJunk.com”;

- (c) causing, facilitating, and/or encouraging third parties to advertise, to market, to display or otherwise to promote any name and/or mark whose use is prohibited to the Defendants under paragraphs (a) and/or (b) of this injunction, whether or not such third parties are compensated for the promotion of such name and/or mark; and
- (d) taking customer advertisements from Plaintiffs' web sites without prior permission from the customers at issue, and/or continuing to use customer advertisements taken from Plaintiffs' web sites without prior permission from the customers at issue.

Redneckjunk expressly waives any and all rights of appeal from this judgment.

2. The parties further jointly request that this Court retain jurisdiction over this matter and the parties for the purpose of enforcing and interpreting the above injunction during and following the disposition of this civil action.

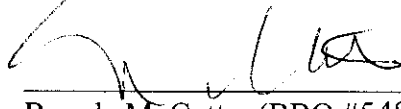
3. The parties further jointly request that the bond deposited with the Court by Boxcar upon this Court's issuance of a preliminary injunction be returned to Boxcar upon entry of the above permanent injunction.

WHEREFORE, the Parties jointly request that the Court grant the relief requested by issuance of the order attached hereto as Exhibit 1.

Concurrence Statement, LR 7.1(a)(2)

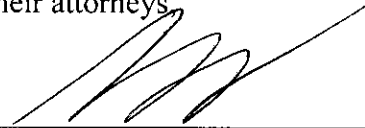
The parties concur with regard to the relief requested in this motion and, as such, file this motion as a joint motion.

Respectfully submitted,
BOXCAR MEDIA, LLC, and
RACEWAY MEDIA, LLC,
by their attorneys,



Brenda M. Cotter (BBO #548004)
Jeffrey P. Hermes (BBO #637952)
BROWN RUDNICK BERLACK ISRAELS LLP
One Financial Center
Boston, MA 02111
(617) 856-8200 Tel; (617) 856-8201 Fax

Respectfully submitted,
REDNECKJUNK, LLC,
DR. THOMAS P. CONNELLY, and
CONNELLY RACING, INC.,
by their attorneys,



Robert F. Casey, Jr. (BBO #C 77766)
ROBERT F. CASEY, JR., P.C.
6 Lancaster County Road
Harvard, MA 01451

Dated: September 15, 2005